

**FEDERAL DEFENDER SERVICES  
OF WISCONSIN, INC.**

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February 24, 2022

Honorable James D. Peterson  
United States District Court Chief Judge  
120 North Henry Street  
Madison, Wisconsin 53703

Re: *United States v. Daniel Peggs*  
Case No. 20-cr-20-jdp

Dear Judge Peterson:

The government has moved for restitution against Mr. Peggs, and the defense is requesting a one-month extension to file a response.

Since arriving at the prison, Mr. Peggs had been in segregation. I received a letter from him this week, where he indicated he now has COVID and is still in isolation—in what is called the segregated housing unit. During this time, I have not been able to communicate with him about the government's request and our position. Some of it could be unobjectionable, other parts we may contest. However, before I set out a firm position, I will need to discuss it all with Mr. Peggs. And I have not been able to do so.

Therefore, I would respectfully request a one-month extension in order to file a response. While this may seem like a long time, prison calls are extremely difficult to set up and since Peggs arrived and was in quarantine and now is still in quarantine, he does not have a case manager that I can set up a call with. Thus, it could be some time. I would respectfully request the response brief be due on March 24, 2020. By then, I should be able to communicate with Peggs.

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I reached out to AUSA Julie Pfluger for her position, but I have not heard back about whether she opposes this request.

Sincerely,

*/s/ Joseph A. Bugni*

Joseph A. Bugni  
Associate Federal Defender